

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA  
(WILLIAMSPORT)

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FILED  
WILLIAMSPORT, PA  
3-21-01

MAR 21 2001

MARY E. D'ANDREA, CLERK  
Per Oh DEPUTY CLERK

ROBERT LEON BUCKNER,  
Plaintiff, pro se,

v.

DR. ANTHONY BUSSANICH, M.D.,  
and, DONALD ROMINE, WARDEN,  
Defendants.

CIVIL ACTION No.:

1:CV-00-01647

Judge Caldwell

\* \* \* \* \* oöo \* \* \* \* \*

MOTION FOR EMERGENCY PRELIMINARY INJUNCTION

COMES NOW, Plaintiff, Robert Leon Buckner ("Buckner"), pro se in this action, urgently requesting the Court to grant Buckner emergency relief pursuant to the Court's valid jurisdiction over Defendant, Dr. Anthony Bussanich, M.D., and Donald Romine, Warden, United States Penitentiary, Lewisburg, and their counsel, David Barasch, United States Attorney, Middle District of Pennsylvania, laid in Rule 65, Fed.R.Civ.P., by issuance of a preliminary order or injunction enjoining the Defendants to immediately cease and desist in the further discontinuation of Buckner's medications which persist of Klonopin® 2 mg. and Antivert® 25 mg. taken orally, three times a day, as well as proper analgesics no less than two tablets of Tylenol #3® taken orally three (3) times a day, for the treatment of his Meneire's disease, as well as his severe pain.

In support of this Motion, Plaintiff respectfully submit the following matters for review and consideration:

1.) There is a substantial likelihood that Plaintiff will eventually prevail on the merits of his claim;

2.) Plaintiff will suffer irreparable injury unless the injunction issues forthwith;

3.) The threatened injury to Plaintiff outweighs whatever damage the proposed injunction may cause the opposing parties, which is no damage at all;

4.) The injunction, if issued, would not be adverse to the public's, or any other party's interest;

5.) The Plaintiff has already suffered severe cardiac disorders which have been brought on by the stress caused by the Meniere's and pain. This condition came to a point where Plaintiff was taken out by ambulance on Friday, March 9, 2001, for, what has been told to Plaintiff by Emergency Room physicians, a moderate heart attack, brought on by this stress.

6.) That the Emergency Room physician treated Plaintiff with Klonopin® and Antivert®, as well as analgesics, which, after this treatment of the Meniere's disease and pain, brought his blood pressure and heart rate to a near normality.

7.) Plaintiff has not been examined by a physician or other medical staff since his return from Evangelist Hospital on the night of Friday, March 9, 2001. (the date of this writing is Thursday, March 15, 2001.)

8.) The Plaintiff continues to suffer the same severe back pain, chest pain, vertigo, tinitus, nausea, and difficulty in breathing, which found him in the hospital E.R. March 9, 2001.

WHEREFORE, Plaintiff respectfully requests' the Court to issue in ORDER preliminarily enjoining the Defendants, Dr. Anthony Bussanich, M.D., and Donald Romine, Warden, and/or any of their officers, agents, servants, employees, subordinates, and those persons in active concert or participation with them, from any further denial of Plaintiff's medications, to wit; Klonopin® 2 mg.; Antivert® 25 mg.; and appropriate analgesics (no less than two (2) tablets of Tylenol #3® per dosage), to be dispensed to Plaintiff Buckner no less than three (3) times daily.

DATE: March 15, 2001.



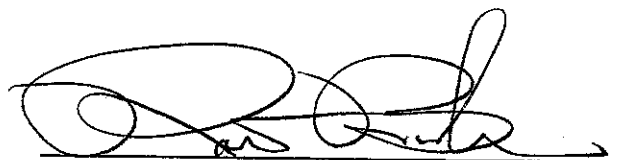
Robert Leon Buckner,

Plaintiff, pro se

BOP REG. No. 33001-037  
Federal Prison Camp Lewisburg  
P.O. Box 2000 - Unit K01-009L  
Lewisburg, Pennsylvania 17837

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing motion was mailed, first class postage prepaid, on this <sup>15th</sup>~~18th~~ day of March, 2001, to:  
Mr. Matthew Haggerty, Esq., AUSA, 240 West Third Street,  
316 Federal Building, Williamsport, Pennsylvania 17703.



Robert Leon Buckner